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CLERK U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
YOUNGSTOWN

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	INFORMATION
Plaintiff,	)	
v.	)	CASE NO. 4:17 CR 0070
	)	Title 21, Section 846, United States Code
JAMES A. CLEELAND, CHRISTOPHER M. STANEC, aka Michael Stanec, aka Mark Conner,	)	JUDGE BOYKO
Defendants.	)	MAG. JUDGE BAUGHMAN

COUNT 1

The United States Attorney charges:

1. Beginning at least as early as August 28, 2013, until at least October 15, 2013, the exact dates unknown to the Grand Jury, in the Northern District of Ohio, Eastern Division, JAMES A. CLEELAND and CHRISTOPHER M. STANEC, aka Michael Stanec, aka Mark Conner, the defendants herein, and others unknown to the grand jury, did knowingly, and intentionally combine, conspire, confederate and agree together, with each other, and with diverse other persons to import from China into the United States, and to manufacture, distribute, and possess with intent to distribute, 298.3 grams or more of a mixture and substance containing

a detectable amount of anabolic steroids, a Schedule III controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(E)(i), and (b)(1)(E)(iii), 952(b), and 960(b)(5).

MANNER AND MEANS OF THE CONSPIRACY

2. It was part of the conspiracy that CHRISTOPHER M. STANEC, aka Michael Stanec, aka Mark Conner, and JAMES A. CLEELAND imported a mixture and substance containing a detectable amount of anabolic steroids from sources located in China. To avoid detection by law enforcement, STANEC used a fictitious name.

3. It was further part of the conspiracy that CHRISTOPHER M. STANEC, aka Michael Stanec, aka Mark Conner, agreed to receive the anabolic steroids from China and then provide them to JAMES A. CLEELAND.

ACTS IN FURTHERANCE OF THE CONSPIRACY

4. In furtherance of the aforementioned conspiracy and to accomplish the objects thereof, and to effect the goals and conceal the existence of the conspiracy, the defendants performed acts, in the Northern District of Ohio, Eastern Division, including but not limited to the following:

a. On or about August 28, 2013, STANEC purchased from Western Union a wire transfer in order to send money from the United States, specifically from Ohio, to person(s) located in China.

b. On or about August 28, 2013, after purchasing the wire transfer, STANEC texted that wire's Money Transfer Control Number to CLEELAND's phone.

c. On or about September 28, 2013, persons in China sent from China via Express Mail Service, an international carrier, a package, containing a detectable amount of anabolic steroids, to a location and person in the United States.

d. On or about October 8, 2013, STANEC called the United States Postal Service (USPS) and, using a tracking number, inquired about a particular package.

e. On or about October 9, 2013, STANEC called the USPS and, using a tracking number, inquired about a particular package.

f. On or about October 15, 2013, STANEC was notified that he could get the package at the Canfield, Ohio, Post Office. At STANEC's direction, STANEC's wife went to the Post Office and picked up the package containing anabolic steroids.

g. On or about October 15, 2013, during a telephone call with STANEC, CLEELAND stated that he had "kinda, wrote that [package] off, brother." The two then made arrangements for STANEC to deliver the package to CLEELAND on October 16, 2013.

h. On or about October 15, 2013, STANEC possessed 398 grams of liquid-form anabolic steroids and $7,000.

i. On or about October 16, 2013, CLEELAND possessed empty glass vials, syringes, latex gloves, a capsule press, a digital scale, empty capsules, 50.8 grams of liquid-form anabolic steroids and 81 tablets of a synthetic anabolic steroid.

All in violation of Title 21, United States Code, Section 846.

FORFEITURE

The United States Attorney further charges:

For the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853, the allegations of Count One are incorporated herein by reference. As a result of the foregoing offenses, JAMES A. CLEELAND and CHRISTOPHER M. STANEC, aka Michael Stanec, aka Mark Conner, shall forfeit to the United States any and all property constituting, or derived from, any proceeds they obtained, directly or indirectly, as the result of such violations; and any and all of their property used or intended to be used, in any manner or part, to commit or to facilitate the commission of such violations; including, but not limited to the following:

a. $7,000 in U.S. Currency; and

b. 2003 Cadillac Escalade VIN: 1GYEK63N83R1205336.

CAROLE S. RENDON
United States Attorney

By: ______________________________
Robert E. Bulford,
Attorney in Charge, Criminal Division
Akron Branch Office